

MILES EHRLICH (Bar No. 237954)
miles@ramsey-ehrlich.com
 ISMAIL RAMSEY (Bar No. 189820)
izzy@ramsey-ehrlich.com
 FELICIA GROSS (Bar No. 231909)
felicia@ramsey-ehrlich.com
 RAMSEY & EHRLICH LLP
 803 Hearst Avenue
 Berkeley, CA 94710
 (510) 548-3600 (Tel)
 (510) 291-3060 (Fax)

Attorneys for Defendant Hisham Mushasha

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CASE No.: CR-07-00734-MMC

UNITED STATES OF AMERICA,

PLAINTIFF,

V.

HISHAM MUSHASHA,

DEFENDANT.

STIPULATION AND [PROPOSED] ORDER TO MODIFY BAIL CONDITIONS

The defendant Hisham Mushasha and the government stipulate that this Court should enter an order modifying the defendant's bail conditions to extend the period the defendant shall be allowed to leave his residence. He is currently released subject to electronic monitoring. He is allowed to leave his residence from Monday through Friday – 6 am to 9 pm. Saturday and Sunday – 10 am to 4 pm. Otherwise, the defendant is to

1 remain on curfew.

2 Defense counsel has contacted Pretrial Services Officer Rich Sarlatte, who has
3 supervised Mushasha while he has been released. He does not object to the proposed
4 changes. During the approximately five months in which Mushasha has been supervised,
5 he has had no violations. He also has been employed throughout this period. He is the
6 CFO of a local construction company and commercial general contractor.

7 Accordingly, the defendant and the government stipulate that this Court should
8 enter an order modifying the defendant's release conditions as follows:

9 The defendant will remain on electronic monitoring but will be permitted to leave
10 his residence from Monday through Sunday – 6 am to 10 pm.

11 Dated:

Respectfully Submitted,
RAMSEY & EHRLICH LLP

14 ISMAIL RAMSEY
15 ATTORNEY FOR HISHAM
16 MUSHASHA

17 JOSEPH P. RUSSONIELLO
18 US ATTORNEY

19 TRACIE BROWN
20 ASSISTANT US ATTORNEY

21 GOOD CAUSE HAVING BEEN SHOWN, IT IS SO ORDERED. This court
22 orders that defendant Hisham Mushasha's release conditions be modified to permit the
23 defendant to leave his residence on the following schedule:

24 Monday through Sunday – 6 am to 10 pm

25 Otherwise, he shall remain on electronic monitoring and will be subject to curfew.

26 Dated:

27 HON. BERNARD ZIMMERMAN
28 US MAGISTRATE JUDGE